REMARKS

Please cancel Claims 4 and 5 without prejudice. Claims 1, 3, 6-7, 10-17 and 19-24 are pending. Claims 1, 3, 6-7 and 10-11 are amended herein.

Claims 12-17 and 19-24 are allowed. Applicant thanks the Examiner for allowing Claims 12-17 and 19-24.

102 Rejections

The instant Office Action states that Claims 1, 3, 6 and 10-11 are rejected under 35 U.S.C. § 102(a) as being anticipated by Kawase et al. ("Kawase;" U.K. Patent Application GB 2 379 414 A). The Applicant has reviewed the cited reference and respectfully submits that the embodiments of the present invention recited in Claims 1, 3, 6 and 10-11 are not anticipated nor rendered obvious by Kawase.

Applicant respectfully submits that Kawase does not show or suggest "a print medium feed mechanism comprising a roller, wherein said roller has located thereon a plurality of marks, said marks occurring along the circumference of said roller and also along the length of said roller and visible to said optical sensor within the range of movement of said optical sensor, said marks separated by known distances measured in a first direction along said circumference and known distances measured in a second direction along said length, wherein said known distances measured in said first direction and in said second direction are used to determine a position of said optical sensor relative to said print medium" as recited in independent Claim 1 (emphasis added).

While Kawase shows encoding marks 19 along the circumference of a drum 10, and alignment marks 11 along the length of the drum 10, Applicant respectfully submits that Kawase does not show or suggest that the alignment marks 11 are separated by a known distance. In particular, Applicant respectfully submits that Kawase does not show or suggest that the distance between the alignment marks 11 is used to determine

the position of an optical sensor as recited in Claim 1 (or the position of a printhead as recited in Claim 11). That is, Applicant respectfully submits that the alignment marks 11 of Kawase are only used to properly align a substrate 30 on the drum 10, or to determine whether or not the substrate 30 is properly aligned, but there is no showing or suggestion in Kawase that the distances between the alignment marks 11 are known and that those distances are used to determine the position of an optical sensor. Applicant respectfully notes that the encoding marks 19 of Kawase do not occur along the length of the drum 10.

Therefore, Applicant respectfully submits that the basis for rejecting Claim 1 under 35 U.S.C. § 102(a) is traversed, and that Claim 1 is in condition for allowance. As such, Applicant respectfully submits that the basis for rejecting Claims 3, 6 and 10-11 under U.S.C. § 102(a) is also traversed, as Claims 3, 6 and 10-11 are dependent on an allowable base claim and recite additional limitations.

Furthermore, Claim 3 recites that an embodiment of the present invention is directed to a system "wherein said marks along said length of said roller are visible to said optical sensor during transport of said print medium, wherein said print medium is opaque" (emphasis added). Applicant respectfully submits that the alignment marks 11 of Kawase are not visible to an optical sensor if the substrate 30 is opaque. For this additional reason, Applicant respectfully submits that the basis for rejecting Claim 3 under U.S.C. § 102(a) is traversed.

103 Rejections

The instant Office Action states that Claim 7 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Kawase in view of Marinoff (U.S. Patent No. 4,207,578). The Applicant has reviewed the cited references and respectfully submits that the embodiment of the present invention recited in Claim 7 is not anticipated nor rendered obvious by Kawase and Marinoff, alone or in combination.

As presented above, Applicant respectfully submits that Kawase does not show or suggest the embodiment of the present invention recited in Claim 1. Applicant respectfully submits that Marinoff does not overcome the shortcomings of Kawase. Specifically, Applicant respectfully submits that Marinoff, alone or in combination with Kawase, does not show or suggest "a print medium feed mechanism comprising a roller, wherein said roller has located thereon a plurality of marks, said marks occurring along the circumference of said roller and also along the length of said roller and visible to said optical sensor within the range of movement of said optical sensor, said marks separated by known distances measured in a first direction along said circumference and known distances measured in a second direction along said length, wherein said known distances measured in said first direction and in said second direction are used to determine a position of said optical sensor relative to said print medium" as recited in Claim 1 (emphasis added).

Because Claim 7 is dependent on independent Claim 1 and recites additional limitations, Applicant respectfully submits that Kawase and Marinoff (alone or in combination) also do not show or suggest the embodiment of the present invention recited in Claim 7. Therefore, Applicant respectfully submits that the basis for rejecting Claim 7 under 35 U.S.C. § 103(a) is traversed, and that Claim 7 is in condition for allowance as being dependent on an allowable base claim.

Conclusions

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1, 3, 6 and 10-11 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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Date: 6/29/05

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